

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: May 1, 2008

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

Fred Campbell, Chief
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STATUS REPORT
May, 2008
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Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

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Information Regarding PSAPs:

Keystone has received Phase I and/or Phase II requests from all nine of the PSAPs in its market, and has completed installation of its Phase I deployments in eight of the nine counties in its market (*i.e.*, Berks County, Centre County, Lycoming County, Schuylkill County, Montour County, Clinton County, Northumberland County, and Snyder County). As previously reported, Keystone is in the process of completing its Phase I installation in Union County, the ninth county, and is working with the Union County PSAP and Intrado to design and install the requisite ENCAS solution. Additionally, since its last report, Keystone completed conversion of the Berks County Phase I installation from a CAS solution to an NCAS solution, so that now all of the Phase I installations in Keystone's market are using NCAS solutions and Intrado as the central hub, which is a requirement for moving to the Phase II E-911 deployment.

Keystone and Essential Management Services, LLC ("EMS"), whom Keystone has retained as its liaison with the various PSAPs and with the State of Pennsylvania, continue to maintain regular contact with the PSAPs and to provide them with information on the status of Keystone's Phase II E-911 deployment. EMS continues to attend the monthly Public Safety Regional Meetings, where it discusses E-911 matters with the PSAPs on behalf of Keystone. To date, neither the Pennsylvania Emergency Management Agency ("PEMA"), which is the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, nor any

PSAP has expressed any concerns or issues with respect to Keystone's Phase II E-911 implementation efforts.

EMS also continues to work with PEMA regarding Keystone's Wireless 9-1-1 Cost Recovery Plan ("CRP"), which was initially submitted to PEMA in March of 2007. As previously reported, Keystone submitted a revised 2007/2008 CRP to PEMA in November 2007.. Additionally, Keystone, with EMS' assistance, prepared another report on potential Phase II solutions for its market, which was submitted to PEMA on March 1, 2008 (CPR 2008/2009). Keystone has received a preliminary response and partial approval of the 2008/2009 CRP and has appealed the PEMA ruling. Keystone is currently waiting for review of the appeal and a final ruling from PEMA on cost recovery for Phase II E-911. EMS is continuing to assist Keystone with its communications with the PEMA and with keeping the PSAPs in Keystone's market advised of the status of the PEMA funding for Keystone's Phase II deployment.

Implementation of Phase II Service:

Keystone is exploring a Phase II E-911 solution with a leading manufacturer of network-based solutions and they are conducting a study of Keystone's market to ascertain what would be the most effective network-based solution for the market. Keystone has taken preliminary steps in the process of negotiating a contract for this potential Phase II solution. Keystone has incorporated this study and the correlating expenses estimate into its 2008/2009 CRP, and anticipates that PEMA will then take this information into account when making a determination as to the approval of funding for Keystone's Phase II deployment. Upon receipt of any commitment of funds from the PEMA and the execution of a definitive agreement with the manufacturer of the Phase II solution, Keystone will be able to schedule deployment of Phase II in its market. Keystone anticipates that it may be able to commence deployment late in the third quarter of 2008.

Because Keystone's service area is very rural or less densely populated and the cell sites are spread far apart, only a portion of Keystone's service area is susceptible to triangulation techniques. Therefore, when Keystone implements the network-based Phase II E-911 solution, which utilizes triangulation techniques, it will not reach the requisite 67% and 95% accuracy requirements prescribed by §20.18(h)(1) or (2) of the Commission's rules at the PSAP level in all parts of the licensed area. However, Keystone expects to meet the Commission's requirements in the core population areas of the market. Thus, Keystone will almost certainly have to file a request with the Commission for a waiver of these accuracy standards until such time as there are further technological advancements in this field allowing for full compliance with §20.18(h) of the rules.

Construction of New Cells and Expansion of Coverage:

Since its last Status Report, Keystone has not constructed any new cell sites in its market. However, Keystone has upgraded one of its existing cell sites in its market, such that it now has a larger coverage area.